

ROLNICK KRAMER SADIGHI LLP
Lawrence M. Rolnick (*pro hac vice* forthcoming)
lrolnick@rksllp.com
Marc B. Kramer (*pro hac vice* forthcoming)
mkramer@rksllp.com
Michael J. Hampson (*pro hac vice* forthcoming)
mhampson@rksllp.com
Richard A. Bodnar (*pro hac vice*)
rbodnar@rksllp.com
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 597-2800
Facsimile: (212) 597-2801

ST. JAMES LAW, P.C.
Michael St. James, CSB No. 95653
22 Battery Street, Suite 810
San Francisco, California 94111
(415) 391-7566 Telephone
(415) 391-7568 Facsimile
michael@stjames-law.com

Attorneys for the PGIM FI Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**DECLARATION OF RICHARD A.
BODNAR IN OPPOSITION TO
REORGANIZED DEBTORS' ELEVENTH
SECURITIES CLAIMS OMNIBUS
OBJECTION (CLAIMS BARRED BY
THE STATUTE OF REPOSE)**

Hearing Information:

Date: September 14, 2021
Time: 10:00 a.m. (Pacific Time)
Place: (Telephone Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Richard A. Bodnar, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information and belief:

4 1. I am Senior Counsel at Rolnick Kramer Sadighi LLP, located at 1251 Avenue of
5 the Americas, New York, New York 10020, counsel for Individual Claimants Gibraltar Universal
6 Life Reinsurance Co Plaz Trust 1-GULREAZTR1; Horizon Healthcare of New Jersey, Inc. -
7 HBC2; Horizon Healthcare Services, Inc. – HBC; Dryden Arizona Reinsurance Term Company -
8 Tax Liabilities Account-DARTTAX; Lucent Technologies Inc. Master Pension Trust - PORTL;
9 PRU Credit Income Fund 2017, a Series Trust of Multi Manager Global Investment Trust -
10 CORPMATPB7; PRUCO Life Insurance Company of New Jersey – PLNJ; Prudential Arizona
11 Reinsurance Captive Company - PLAZ TRUST 1-PLAZTR1; The Prudential Insurance Company
12 of America - Individual Life Long Term Core Public Bonds – ILLONG; The Prudential Insurance
13 Company of America - PICA/POJ IRELP Trust – IRELPTR; The Prudential Insurance Company
14 of America - Congo PICA Single Client Buy-Out SA-GAR PRD-CONGA; The Prudential
15 Insurance Company Of America - Long Duration Corporate Bond Account - TOLILDC; and
16 Verizon Transition Account – VZTRANS (the “**PGIM FI Claimants**”).

17 2. I submit this declaration in opposition to Reorganized Debtors’ Eleventh Securities
18 Claims Omnibus Objection (Claims Barred by the Statute of Repose).

19 3. Attached hereto as **Exhibit A** is a true and correct copy of the Order Granting
20 Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead
21 Counsel dated September 10, 2018, and entered in the matter *In re PG&E Corp. Securities*
22 *Litigation*, No. 5:18-cv-03509-EJD (N.D. Cal.) (the “**Securities Class Action**”).

23 4. Attached hereto as **Exhibit B** is a true and correct copy of the Notice of Motion and
24 Motion of the Public Employees Retirement Association of New Mexico for Consolidation,
25 Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel; Memorandum of Points
26 and Authorities in Support thereof dated August 13, 2018, filed in the Securities Class Action.

27 5. Attached hereto as **Exhibit C** is a true and correct copy of the Public Employees
28 Retirement Association of New Mexico’s Loss Analysis filed in the Securities Class Action.

6. Attached hereto as **Exhibit D** is a true and correct copy of the Public Employees Retirement Association of New Mexico Lead Plaintiff Certification dated August 10, 2018, filed in the Securities Class Action.

7. Attached hereto as **Exhibit E** is a true and correct copy of the Consolidated Class Action Complaint for Violation of the Federal Securities Laws dated November 9, 2018, filed in the Securities Class Action.

8. Attached hereto as **Exhibit F** is a true and correct copy of an excerpt from a file named "NYSE_Bond_Master_List" published by the New York Stock Exchange and available at: <https://www.nyse.com/products/bonds>. According to the NYSE's website, this list contains the bonds that are traded on the New York Stock Exchange. The excerpted portion of the file contains the bond symbol, issuer name, interest rate, and maturity date for each bond listed in the file as of August 31, 2021, where PG&E Corporation or Pacific Gas and Electric Company is the issuer.

9. Attached hereto as **Exhibit G** is a true and correct copy of the Order and Stipulation to Amend and Lead Plaintiff's Notice of Withdrawal of Motion dated November 26, 2018, filed in the Securities Class Action.

10. Attached hereto as **Exhibit H** is a true and correct copy the Second Amended Consolidated Class Action Complaint for Violation of The Federal Securities Laws dated December 14, 2018, filed in the Securities Class Action.

11. Attached hereto as **Exhibit I** is a true and correct copy of the Amended Stipulation and Order to Consolidate and File Third Amended Consolidated Class Action Complaint dated May 7, 2019, filed in the Securities Class Action.

12. Attached hereto as **Exhibit J** is a true and correct copy of the Third Amended Consolidated Class Action Complaint for Violation of the Federal Securities Laws dated May 28, 2019, filed in the Securities Class Action.

13. Attached hereto as **Exhibit K** is a true and correct copy of the Public Employees Retirement Association of New Mexico Lead Plaintiff Certification dated May 28, 2019, filed in the Securities Class Action.

14. Attached hereto as **Exhibit L** is a true and correct copy of the Rescission or Damage

1 Claim Proof of Claim Form issued in the above-caption bankruptcy proceeding.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct. Executed on August 31, 2021.

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